

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CARLO LICATA, on behalf of himself, and on behalf of all persons similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 15-cv-4022
)	
FACEBOOK, INC., a Delaware Corporation,)	Hon. Elaine E. Bucklo
)	
)	
Defendant.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant Facebook, Inc. (“Facebook”), by and through its undersigned counsel, respectfully moves the Court for a 45-day extension of time, to and including June 27, 2015, to respond to Plaintiff’s Complaint. In support of this motion, Facebook states:

1. Plaintiff Carlo Licata filed this putative class action in Illinois state court. Facebook was served with the Complaint on April 7, 2015, and filed a timely Notice of Removal on May 6, 2015.

2. Facebook’s response to the Complaint is currently due on May 13, 2015, which is seven days after the filing of the Notice of Removal. *See* Fed. R. Civ. P. 81(c)(2)(C).

3. Facebook requires a 45-day extension of time to respond to the Complaint so that it may thoroughly research and investigate Facebook’s potential responses to the Complaint and its available defenses.

4. This motion is brought in good faith and not for the purpose of delay, and will not result in prejudice to either party. Facebook has not previously sought an extension of time to respond to the Complaint.

5. Prior to the filing of this motion, counsel for Facebook consulted with counsel for Plaintiff, who indicated that he consents to the relief sought by this motion.

WHEREFORE, for the foregoing reasons, Facebook respectfully requests that the Court enter an order extending the deadline for Facebook to answer, move to dismiss, or otherwise respond to the Complaint to and including June 27, 2015.

Dated: May 7, 2015

Respectfully submitted,

By: /s/ Vincent Connelly

Vincent Connelly
Michael D. Frisch
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 782-0600
Facsimile: (312) 701-7711
vconnelly@mayerbrown.com
mfrisch@mayerbrown.com

Lauren R. Goldman (application for
admission pending)
MAYER BROWN LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 506-2647
lgoldman@mayerbrown.com

Archis A. Parasharami
MAYER BROWN LLP
1999 K Street, N.W.
Washington, D.C. 20006
Telephone: (202) 263-3328
aparasharami@mayerbrown.com

Counsel for Defendant Facebook, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on May 7, 2015, this **Agreed Motion for Extension of Time to Respond to Complaint** was electronically filed with the Clerk of the Court using the CM/ECF system and that copies of the foregoing were sent by e-mail and first-class U.S. mail to the following parties:

Jay Edelson
jedelson@edelson.com
Rafey S. Balabanian
rbalabanian@edelson.com
Benjamin H. Richman
brichman@edelson.com
J. Dominick Larry
nlarry@edelson.com
David I. Mindell
dmindell@edelson.com
EDELSON PC
350 N. LaSalle Street, Suite 1300
Chicago, IL 60654
Tel: (312) 589-6370
Fax: (312) 589-6378

Counsel for Plaintiff

Dated: May 7, 2015

By: /s/ Michael D. Frisch

Michael D. Frisch

Counsel for Defendant Facebook, Inc.